

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

UNITED FOOD AND COMMERCIAL
WORKERS UNIONS AND EMPLOYERS
MIDWEST HEALTH BENEFITS FUND, on
behalf of itself and all others similarly
situated,

Plaintiff,

vs.

FOUGERA PHARMACEUTICALS, INC.,
HI-TECH PHARMACAL CO., INC.,
PERRIGO COMPANY PLC, SANDOZ,
INC., TARO PHARMACEUTICAL
INDUSTRIES, LTD., TARO
PHARMACEUTICALS USA, INC., and
WOCKHARDT USA LLC,

Defendants.

Case No. 1:16-cv-07979-WHP

RULE 7.1 DISCLOSURE STATEMENT OF FOUGERA PHARMACEUTICALS INC.

Pursuant to Federal Rule of Civil Procedure 7.1, the undersigned attorneys of record for defendant Fougera Pharmaceuticals Inc. (“Fougera”) state that Fougera is an indirect, wholly owned subsidiary of Novartis AG, a publicly held company, the shares of which are traded on the SIX Swiss Exchange under the ticker symbol NOVN and whose American Depositary Shares are publicly traded on the New York Stock Exchange under the ticker symbol NVS. There are no publicly traded companies between Fougera and Novartis AG.

Dated: New York, New York
November 21, 2016

/s/ Saul P. Morgenstern
Saul P. Morgenstern
Margaret A. Rogers
KAYE SCHOLER LLP
250 West 55th Street
New York, NY 10019
Tel: (212) 836-8000
Email: saul.morgenstern@kayescholer.com
margaret.rogers@kayescholer.com

Laura S. Shores (*pro hac pending*)
KAYE SCHOLER LLP
901 Fifteenth Street, NW
Washington, D.C. 20005-2327
Tel: (202) 682-3577
Email: laura.shores@kayescholer.com

*Attorneys for Defendant
Fougera Pharmaceuticals Inc.*